



*Attorneys at Law*

45 BROADWAY, SUITE 430, NEW YORK, NEW YORK 10006

TEL: (212) 248-7431 FAX: (212) 901-2107

[WWW.NYCEMPLOYMENTATTORNEY.COM](http://WWW.NYCEMPLOYMENTATTORNEY.COM)

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January 15, 2021

**Via ECF**

Honorable Judge Ramon E. Reyes, Jr.  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Rm. N208  
Brooklyn, New York 11201

**Re: Michael Ramos and Brian Rivera v. Steve Belsito Sons, Inc. et al.**  
**Case No. 1:20-cv-03858-FB-RER**

Dear Judge Reyes:

Our office represents the Plaintiffs, Michael Ramos and Brian Rivera, in the above-referenced matter. We write, jointly with Defendants' counsel, to submit revised dates for the Proposed Case Management Plan Pursuant to Your Honor's January 6, 2021 Order.

Accordingly, the Parties propose the following changes to the paragraphs and respective dates proposed in their initial filing of the Proposed Case Management Plan:

5. (a) The Parties propose revising the deadline for Plaintiffs to make Rule 26(a)(2) disclosures with respect to expert witnesses from March 1, 2021 to April 15, 2021.  
(b) The Parties propose revising the deadline for Defendants to make Rule 26(a)(1) disclosures with respect to rebuttal expert witnesses from March 31, 2021 to May 17, 2021.
6. Lastly, the Parties propose revising the deadline for the completion of all discovery, including depositions of experts, from April 29, 2021 to June 14, 2021.

We thank Your Honor for his attention and consideration of this matter.

Respectfully submitted,

/s/ Brittany Stevens  
Brittany A. Stevens, Esq.  
Janelle J. Romero, Esq.  
*Attorneys for Plaintiff*  
45 Broadway, Suite 430

New York, New York 10006  
T: (212) 248-7431  
F: (212) 901-2107  
bstevens@tpglaws.com  
jromero@tpglaws.com